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2 **UNITED STATES DISTRICT COURT**
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4 **NORTHERN DISTRICT OF CALIFORNIA**
5

6 **SAN FRANCISCO DIVISION**
7

8
9 **IN RE GOOGLE PLAY STORE**
10 **ANTITRUST LITIGATION**

11 THIS DOCUMENT RELATES TO:

12 *Epic Games, Inc. v. Google LLC et al.*,
13 Case No. 3:20-cv-05671-JD

14 *In re Google Play Consumer Antitrust*
15 *Litigation*, Case No. 3:20-cv-05761-JD

16 *State of Utah et al. v. Google LLC et al.*,
17 Case No. 3:21-cv-05227-JD

18 *Match Group, LLC et al. v. Google LLC et al.*,
19 Case No. 3:22-cv-02746-JD

20 Case No. 3:21-md-02981-JD

21 **STIPULATED [PROPOSED] ORDER**
22 **MODIFYING SEALING PROCEDURES**
23 **RELATING TO DISPOSITIVE AND**
24 **DAUBERT MOTIONS**

25 Judge: Hon. James Donato

1 WHEREAS, Plaintiff Epic Games, Inc. (“Epic”), Plaintiffs Match Group LLC, et al.
2 (“Match”), Consumer Plaintiffs, State Attorneys General Plaintiffs, and Defendants Google LLC
3 et al. (“Google,” and collectively, the “Parties”), by and through their undersigned counsel,
4 respectfully move this Court for a modification to the sealing procedures applicable to any
5 dispositive and *Daubert* motions filed in these matters and subsequent briefing on any such
6 motions, on the grounds set forth herein.

7 WHEREAS, under the Third Amended Scheduling Order entered by the Court, dispositive
8 and *Daubert* motions are due on April 20, 2023; responses are due May 18, 2023; and replies are
9 due on June 8, 2023 (ECF No. 447).

10 WHEREAS, the Parties informed the Court in their January 31, 2023 Joint Proposed
11 Schedule: “With respect to dispositive and *Daubert* motions, the Parties will submit a stipulation
12 for approval that states that they will file redacted versions of these briefs and supporting
13 documents on April 20, May 18, and June 8, without accompanying motions to seal.” (ECF
14 No. 434 at 2 n.2.)

15 WHEREAS, the Parties have conferred and agree on a protocol and dates for submitting
16 an Omnibus Sealing Motion following the completion of briefing of dispositive and *Daubert*
17 motions.

18 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED SUBJECT TO
19 THE COURT’S APPROVAL:

- 20 • The Parties shall file redacted versions of any dispositive and *Daubert* motions, as well
21 as any responses and replies to such motions, and any associated supporting documents,
22 as separate entries on the ECF docket; and

- The Parties shall also contemporaneously file unredacted copies of all documents on the ECF docket provisionally under seal, along with a 1-page interim sealing motion which may indicate that the reasons for sealing will be discussed in a forthcoming omnibus sealing motion; and
 - Within twenty-one days of filing any dispositive or *Daubert* motion, as well as any response to such motions, and within fourteen days of filing any reply to a dispositive or *Daubert* motion, that include information filed provisionally under seal, the Parties shall provide each other their purported basis for keeping the redacted information under seal; and
 - The Parties and any non-parties shall jointly file Omnibus Sealing Motions on July 13, 2023 (i.e., five weeks after the completion of dispositive and *Daubert* motion briefing), or any date that this Court chooses following the completion of dispositive and *Daubert* motion briefing.

1 Dated: April 17, 2023

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9 Respectfully submitted,
10 By: /s/ Lauren A. Moskowitz
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14 *Counsel for Plaintiff Epic Games, Inc.*

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7 Dated: April 17, 2023

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1 Dated: April 17, 2023

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9 Dated: April 17, 2023

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HON. JAMES DONATO
United States District Judge

1 **E-FILING ATTESTATION**

2 I, Minna L. Naranjo, am the ECF User whose ID and password are being used to
3 file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the
4 signatories identified above has concurred in this filing.

5
6 _____
7 /s/ *Minna L. Naranjo*
8 Minna L. Naranjo